

→ Declaration Affidavit

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

Case No. 2:24-cv-00379-ROS

DECLARATION OF TAYJALAYA S. WILLIAMS

I, Tayjalaya S. Williams, declare under penalty of perjury that the following is true and correct:

1. Personal Information

- My name is Tayjalaya S. Williams, and I am the Pro Se Defendant in the above-captioned case.
- My address is 2240 S Elks Lane unit 13, Yuma, Arizona 85364.
- My email is Tayjalayastormwilliams@gmail.com, and my phone number is 928-408-1422.

2. Fact 1: **Original Policy**

- On August 21, 2018, Thomas C. Retzlaff executed a life insurance policy before he and I met. This document is attached as Exhibit **A**.

3. Fact 2: **Domestic Partnership**

- On May 17, 2021, Thomas Retzlaff and I filed for a domestic partnership. This document is attached as Exhibit **B**.

4. Fact 3: ***Beneficiary Designations***

- On May 20, 2021, Thomas Retzlaff designated me as the primary beneficiary at 75%, with Collin Retzlaff's share reduced from 90% to 25%, recorded on June 1, 2021. This document is attached as Exhibit **C**.

5. Fact 4: ***Marriage Affidavit and License***

- On June 18, 2021, Thomas Retzlaff and I signed paperwork for a Marriage Affidavit, although we did not get married until August 28, 2021. This document is attached as Exhibit **D**.

6. Fact 5: ***Final Beneficiary Designation***

- On August 28, 2021, the same day as our marriage, Thomas Retzlaff designated me as the 100% sole primary beneficiary. This document is attached as Exhibit **E**.

7. Fact 6: ***Policy Terms***

- Thomas Retzlaff's insurance policy explicitly states, "Even if the insured (Thomas Retzlaff) is not living when we record the change, the change will take effect as of the date it was signed unless otherwise specified." This document is attached as Exhibit **F**.

8. Fact 7: ***Supporting Communications***

- Email communications between Thomas Retzlaff and me confirm his intent to designate me as the sole beneficiary and express his concerns regarding his safety and my financial security. These emails are attached as Exhibit **G**.

9. Fact 8: ***Harassment Concerns***

- Screenshots of text communications between Thomas Retzlaff and me dated August 8, 2021, express his concerns about harassment from Collin Retzlaff and associates. These texts are attached as Exhibit **H**.

10. Fact 9: Irrevocable “No” Designation

- The life insurance policy had a designation of “Irrevocable No,” allowing Thomas Retzlaff to change the beneficiary without needing consent from previous beneficiaries. This document is attached as Exhibit C.

11. Fact 10: **Official Police Report**

- The official police report from the El Mirage Police Department confirms I am not a suspect. The relevant pages of the police report are attached as Exhibits I.1, I.2, and I.3.

- Exhibit I.1: Pages 2-3 of the police report stating I am not a suspect.

- Exhibit I.2: Page 56 of the police report confirming no evidence against me.

- Exhibit I.3: Proof of transmission of the police report to me from the El Mirage Police Department.

12. Fact 11: **El Mirage Police Department Call Log**

- Call log detailing my communication with Detective Vargas of the El Mirage Police Department on April 18, 2024. This call log is attached as Exhibit J.

13. Fact 12: **Email Communication with Transamerica**

- Email communications between Transamerica and me regarding the clarification of their allegations. These emails are attached as Exhibit K.

14. Fact 13: **Plaintiff's Response to Defendant's Motion**

- Document No. 22 filed by Transamerica with contradicting allegations about my involvement. This document is attached as Exhibit L.

15. Fact 14: **No Arrest Warrants or Convictions**

- I have no arrest, warrants or felony convictions on my record before or since, Thomas Retzlaff investigation. This statement is true to the best of my knowledge and belief.

16. Fact 15: ***Interest Entitlement***

- Thomas Retzlaff's insurance policy provides for interest to be paid on the death benefit from the date of death until the payment is made. This document is attached as Exhibit **M**.

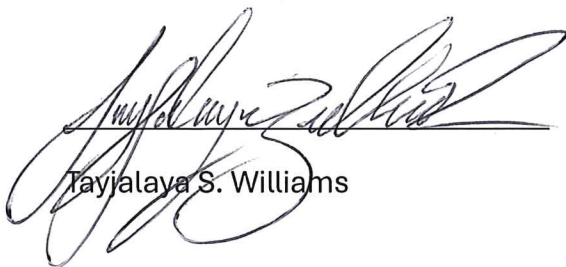
17. ***Interest Calculation Details***

- I have calculated the interest owed on the death benefit from the date of Thomas Retzlaff's death (September 1, 2021) until the funds were interpleaded (February 23, 2024) and potentially beyond (September 9, 2024). **The details of this calculation are included in my summary judgment motion.**

*Declaration Under Penalty of Perjury*

I, Tayjalaya S. Williams, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 16 2024, at Yuma, Arizona.



Tayjalaya S. Williams